

REMARKS

Please reconsider the application in view of the above amendments and the following remarks. Applicant thanks the Examiner for carefully considering this application.

Disposition of Claims

Claims 1-23 are pending in this application. Claims 1-11 and 23 have been cancelled by this reply. Claims 12 and 22 are independent. The remaining claims depend, directly or indirectly, from claim 12.

Claim Amendments

Independent claims 12 and 22 have been amended to clarify the scope of the invention. Specifically, independent claims 12 and 22 have been amended to clarify that: (i) the cast object graph comprises a plurality of objects, (ii) each of the plurality of objects references at least another one of the plurality of objects; (iii) an original name associated with each of the plurality of objects is modified in accordance with the casting rule, and (iv) the casting rule defines how to modify the original name associated with each of the plurality of objects. Support for these amendments may be found, for example, in paragraphs [0024] – [0029]. No new matter has been added by these amendments.

Rejections under 35 U.S.C. §101

Claims 1-11 and 23 stand rejected under 35 U.S.C. §101 as not being limited to statutory subject matter. Claims 1-11 and 23 have been cancelled by this reply. Accordingly, this rejection is now moot and withdrawal of this rejection is respectfully requested.

Rejections under 35 U.S.C. §103

Claims 1-2, 4-7, 12-13, and 15-18 stand rejected under 35 U.S.C. §103 as being unpatentable over U.S. Patent Application Publication No. 2002/0029375 (“Mlynarczyk”) in view of U.S. Patent No. 5,491,821 (“Kilis”). Claims 1-2 and 4-7 have been cancelled by this reply. Accordingly, the rejection is now moot with respect to the cancelled claims. To the extent that this rejection applies to the pending amended claims, the rejection is respectfully traversed.

To establish a *prima facie* case of obviousness “...the prior art reference (or references when combined) must teach or suggest all the claim limitations.” (See MPEP §2143.03). Further, “all words in a claim must be considered in judging the patentability of that claim against the prior art.” (See MPEP §2143.03). The Applicant respectfully asserts that the references, when combined, fail to teach or suggest all the claim limitations of amended independent claim 12.

Specifically, the Mlynarczyk fails to teach or suggest at least the following limitations recited in amended independent claim 12:

- (i) “wherein the cast object graph comprises a plurality of objects, wherein each of the plurality of objects references at least another one of the plurality of objects,”
 - The Applicant respectfully asserts that Mlynarczyk fails to teach or suggest an object graph as recited in the claims. At the outset the Applicant notes that Mlynarczyk is completely silent with respect to any teachings of an object graph. Moreover, the portion of Mlynarczyk cited by the Examiner (*i.e.*, [0033], [0039], [0043] and Figure 4 of Mlynarczyk) shows an inheritance hierarchy of interfaces. The Applicant asserts that interfaces are used to access objects but are not themselves objects. Because Mlynarczyk fails to teach objects, Mlynarczyk

cannot reasonably be interpreted to teach an object graph as recited in the amended claims;

- (ii) “means for instantiating a cast object graph using a casting rule and the internal representation, ... wherein the casting rule defines how to modify the original name associated with each of the plurality of objects” – As discussed above, Mlynarczyk fails to teach or suggest an object graph as recited in the amended claims. It follows that Mlynarczyk does not teach or suggest any mechanism for creating the object graph; and
- (iii) “wherein the casting rule defines how to modify the original name associated with each of the plurality of objects” – The Examiner has admitted that Mlynarczyk does not teach or suggest this limitation. (*See* Office Action mailed August 25, 2005, p. 3).

The Applicant respectfully asserts that Kilis does not teach that which Mlynarczyk lacks. Specifically, Kilis is completely silent with respect to an object graph or any mechanism for creating an object graph.

Thus, amended independent claim 12 is patentable over Mlynarczyk and Kilis. Independent claim 22 includes at least the same patentable limitations as independent claim 12 and, thus, is patentable over Mlynarczyk and Kilis for at least the same reasons as independent claim 12. Dependent claims are allowable for at least the same reasons as their respective independent claims. In view of the above, withdrawal of this rejection is respectfully requested.

Claims 3, 10-11, 14, and 21-23 stand rejected under 35 U.S.C. §103 as being unpatentable over Mlynarczyk and Kilis and further in view of U.S. Patent No. 6,125,400 (“Cohen”). Claims 3, 10-11, and 23 have been cancelled by this reply. Accordingly, the

rejection is now moot with respect to the cancelled claims. To the extent that this rejection applies to the amended claims, the rejection is respectfully traversed.

As discussed above, Mlynarczyk and Kilis fail to teach or suggest all the limitations of amended independent claims 12 and 22. Further, Cohen does not teach that which Mlynarczyk and Kilis lack. This is evidenced by the fact that Cohen is analogous art and is only relied upon to teach “a variable usage specification.” (See Office Action mailed August 25 2005, pp. 5-8). Accordingly, amended independent claims 12 and 22 are patentable over Mlynarczyk, Kilis, and Cohen. Dependent claims 14 and 21, which depend on independent claim 12, are patentable for at least the same reasons. Withdrawal of this rejection is respectfully requested.

Claim 8 and 19 stand rejected under 35 U.S.C. §103 as being unpatentable over Mlynarczyk and Kilis in view of U.S. Patent Application Publication No. 2002/0188950 (“Soloff”). Claim 8 has been cancelled by this reply. Accordingly, the rejection is now moot with respect to the cancelled claim. To the extent that this rejection applies to the amended claims, the rejection is respectfully traversed.

As discussed above, Mlynarczyk and Kilis fail to teach or suggest all the limitations of amended independent claim 12. Further, Soloff does not teach that which Mlynarczyk and Kilis lack. This is evidenced by the fact that Soloff is only relied upon to teach “a parser method.” (See Office Action mailed August 25, 2005, pp. 8-9). Accordingly, amended independent claim 12 is patentable over Mlynarczyk and Soloff. Dependent claim 19, which depends on independent claim 12, is patentable for at least the same reasons. Withdrawal of this rejection is respectfully requested.

Claims 9 and 20 stand rejected under 35 U.S.C. §103 as being unpatentable over Mlynarczyk and Kilis in view of U.S. Patent No. 4,853,843 (“Ecklund”). Claim 9 has been cancelled by this reply. Accordingly, the rejection is now moot with respect to the cancelled

claim. To the extent that this rejection applies to the amended claims, the rejection is respectfully traversed.

As discussed above, Mlynarczyk and Kilis fail to teach or suggest all the limitations of amended independent claim 12. Further, Ecklund does not teach that which Mlynarczyk and Kilis lack. This is evidenced by the fact that Ecklund is only relied upon to teach “a suffix method.” (See Office Action mailed August 25, 2005, pp. 9-10). Accordingly, amended independent claim 12 is patentable over Mlynarczyk, Kilis, and Ecklund. Dependent claim 20, which depends on independent claim 12, is patentable for at least the same reasons. Withdrawal of this rejection is respectfully requested.

Claims 1-2, 4-8, 12-13, and 15-19 stand rejected under 35 U.S.C. §103 as being unpatentable over Mlynarczyk in view of Soloff. Claims 1-2 and 4-7 have been cancelled by this reply. Accordingly, the rejection is now moot with respect to the cancelled claims. To the extent that this rejection applies to the pending amended claims, the rejection is respectfully traversed.

As discussed above, Mlynarczyk fails to teach or suggest all the limitations of amended independent claim 12. Further, Soloff does not teach that which Mlynarczyk lacks. This is evidenced by the fact that Soloff is only relied upon to teach “modification of an object name according to a casting rule.” (See Office Action mailed August 25, 2005, pp. 10-12). Moreover, the Applicant respectfully asserts that the portion of Soloff relied upon by the Examiner to teach the aforementioned limitation does not teach the aforementioned limitation. Specifically, the portion of Soloff relied upon by the Examiner merely teaches that an editor (*i.e.*, a person, see Soloff, Figure 1) can edit text strings on selected files or sub-directories. (See Soloff, [0077]). However, there is no teaching of any casting rule as recited in the claim (*i.e.*, “...the casting rule defines how to modify the original name associated with each of the plurality of objects”) or the

use of any casting rule as recited in the claim (*i.e.*, an original name associated with each of the plurality of objects is modified in accordance with the casting rule”). In view of the above, amended independent claim 12 is patentable over Mlynarczyk and Soloff. Independent claim 22 includes at least the same patentable limitations as independent claim 12 and, thus, is patentable over Mlynarczyk and Kilis for at least the same reasons as independent claim 12. Dependent claims are patentable for at least the same reasons. Withdrawal of this rejection is respectfully requested.

Claims 3, 10-11, 14, and 21-23 stand rejected under 35 U.S.C. §103 as being unpatentable over Mlynarczyk and Soloff and further in view of Cohen. Claims 3, 10-11, and 23 have been cancelled by this reply. Accordingly, the rejection is now moot with respect to the cancelled claims. To the extent that this rejection applies to the amended claims, the rejection is respectfully traversed.

As discussed above, Mlynarczyk and Solof fail to teach or suggest all the limitations of amended independent claims 12 and 23. Further, Cohen does not teach that which Mlynarczyk and Soloff lack. This is evidenced by the fact that Cohen is analogous art and is only relied upon to teach “a variable usage specification.” (*See* Office Action mailed August 25 2005, pp. 12-16). Accordingly, amended independent claims 12 and 22 are patentable over Mlynarczyk, Soloff, and Cohen. Dependent claims 14 and 21, which depend on independent claim 12, are patentable for at least the same reasons. Withdrawal of this rejection is respectfully requested.

Claims 9 and 20 stand rejected under 35 U.S.C. §103 as being unpatentable over Mlynarczyk and Soloff in view of Ecklund. Claim 9 has been cancelled by this reply. Accordingly, the rejection is now moot with respect to the cancelled claim. To the extent that this rejection applies to the amended claims, the rejection is respectfully traversed.


As discussed above, Mlynarczyk and Soloff fail to teach or suggest all the limitations of amended independent claim 12. Further, Ecklund does not teach that which Mlynarczyk and Soloff lack. This is evidenced by the fact that Ecklund is only relied upon to teach "a suffix method." (See Office Action mailed August 25, 2005, pp. 9-10). Accordingly, amended independent claim 12 is patentable over Mlynarczyk, Soloff, and Ecklund. Dependent claim 20, which depends on independent claim 12, is patentable for at least the same reasons. Withdrawal of this rejection is respectfully requested.

Conclusion

Applicant believes this reply is fully responsive to all outstanding issues and places this application in condition for allowance. If this belief is incorrect, or other issues arise, the Examiner is encouraged to contact the undersigned or his associates at the telephone number listed below. Please apply any charges not covered, or any credits, to Deposit Account 50-0591 (Reference Number 16159/020001).

Dated: November 23, 2005

Respectfully submitted,

By 

Robert P. Lord
Registration No.: 46,479
OSHA • LIANG LLP
1221 McKinney St., Suite 2800
Houston, Texas 77010
(713) 228-8600
(713) 228-8778 (Fax)
Attorney for Applicant